

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DARWIN DEASON,

Plaintiff,

– against –

XEROX CORPORATION,

Defendant.

STIPULATION OF
VOLUNTARY DISMISSAL
PURSUANT TO F.R.C.P.
41(a)(1)(A)(ii)

No. 3:16-cv-02856-L

STIPULATION OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii)

WHEREAS, Plaintiff Darwin Deason filed suit in the above-captioned action (the “Litigation”) against Defendant Xerox Corporation on October 11, 2016; and

WHEREAS, Plaintiff and Defendant have reached a settlement in and agreed to dismiss the Litigation pursuant to a Settlement Agreement by and among Defendant, Plaintiff and Conduent Incorporated (“Conduent”), dated as of October 27, 2016 (the “Settlement Agreement”), and an Exchange Agreement by and among Defendant, Plaintiff and Conduent, dated as of October 27, 2016;

IT IS HEREBY STIPULATED AND AGREED, by and among the parties, through their undersigned counsel, that:

1. The Litigation is dismissed pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii); and

2. Plaintiff will not re-file the complaint filed in the Litigation, or commence or pursue any litigation asserting the claims therein, unless either Plaintiff or Defendant validly exercises its termination rights pursuant to Section 6 of the Settlement Agreement.

DATED: October 27, 2016

Jackson Walker LLP

by

s/ David T. Moran

David T. Moran

2323 Ross Avenue, Suite 600

Dallas, Texas 75201

Email: dmoran@jw.com

COUNSEL FOR PLAINTIFF

Lynn Pinker Cox & Hurst, LLP

by

s/ Christopher J. Schwegmann

Christopher J. Schwegmann

2100 Ross Avenue, Suite 2700

Dallas, Texas 75201

Email: cschwegmann@lynnllp.com

COUNSEL FOR DEFENDANT